

EXHIBIT M

R. Kraft e-mail correspondence to R. Higgins, dated June 25, 2021

Roger Higgins

From: Rune Kraft <rk@kraft.legal>
Sent: Friday, June 25, 2021 3:39 PM
To: Roger Higgins
Cc: ryan.roman@akerman.com
Subject: RE: Kraft v. Chevron Corp. et al., Case No. 2:21-cv-00575-DJH (the "Arizona Litigation").

Follow Up Flag: Follow up
Due By: Monday, June 28, 2021 9:00 AM
Flag Status: Flagged

Mr. Higgins,

This is a RICO action against W.R. Grace & Co. The holding in *Daily* is simple: "money obtained by fraud is not dischargeable in bankruptcy".

I am happy to interact with you about the specific facts and issues of law contained in the Complaint.

I am also happy to review the order you reference.

And while you are at it, proof of serving my companies with the referenced order, or any motions you filed related to the referenced order.

Thanks,

Rune

From: Roger Higgins <rhiggins@rogerhigginslaw.com>
Sent: Friday, June 25, 2021 4:48 PM
To: rk@kraft.legal
Cc: ryan.roman@akerman.com
Subject: RE: Kraft v. Chevron Corp. et al., Case No. 2:21-cv-00575-DJH (the "Arizona Litigation").

Mr. Kraft,

The facts of the *Daily* case differ significantly from those present in this matter, and the holding is therefore not relevant. Moreover, there is nothing in the complaint you filed to support your allegation.

Finally, the Plan and Confirmation Order specifically contemplate meritless allegations of the type asserted against my client, W. R. Grace & Co. ("Grace") in your complaint. In particular, the Plan and Confirmation Order preclude and forever bar you from asserting any such Administrative Expense Claim against Grace in any forum, whether the Arizona District Court, the Delaware Bankruptcy Court, or otherwise:

based upon any act or omission, transaction, or other activity, event, or occurrence of any kind or nature that occurred prior to the Effective Date, whether or not the facts of or legal bases therefor were known or existed prior to the Effective Date.

Plan Art. 8.1.1.

Please be further advised that, as discussed in my letter of earlier today, if you take any action in the Arizona Litigation other than filing a motion seeking dismissal of Grace with prejudice, Grace reserves the right seek entry of an order by the Delaware Bankruptcy Court imposing sanctions on you for any such violations of the Confirmation Order, including but not limited to attorneys' fees and other expenses arising from Grace's enforcement of the Confirmation Order. *See In re*

Continental Airlines, Inc., 236 B.R. 318 (Bankr. D. Del. 1999) (imposing sanctions for civil contempt in violation of a chapter 11 plan confirmation order).

Warmest Regards. R

Roger J. Higgins

THE LAW OFFICES OF ROGER HIGGINS, LLC

516 N. Ogden Ave

Suite 136

Chicago, IL 60642

United States

Tel: (312) 480-1984

e-mail: rhiggins@rogerhigginslaw.com

www.rogerhigginslaw.com

This message contains PRIVILEGED AND CONFIDENTIAL INFORMATION intended solely for the use of the addressee(s) named above. Any disclosure, distribution, copying or use of the information by others is strictly prohibited. If you have received this message in error, please notify the sender by immediate reply and delete the original message. Thank you.

From: Rune Kraft <rk@kraft.legal>

Sent: Friday, June 25, 2021 12:28 PM

To: Roger Higgins <rhiggins@rogerhigginslaw.com>

Cc: ryan.roman@akerman.com

Subject: RE: Kraft v. Chevron Corp. et al., Case No. 2:21-cv-00575-DJH (the "Arizona Litigation").

Mr. Higgins,

W.R. Grace & Co. obtained money by fraud and, therefore, not dischargeable in bankruptcy e.g. *In re Daily*, 47 F.3d 365, 368 (9th Cir. 1995).

Thanks,

Rune

KRAFT

Kraft Legal | United States
108 West 13th Street
Wilmington, Delaware 19801
302 408 1000
rk@kraft.legal
<https://kraft.legal/>

From: Roger Higgins <rhiggins@rogerhigginslaw.com>

Sent: Friday, June 25, 2021 12:49 PM

To: rk@kraft.legal; Ingrid.Aronson@Kraft.Legal

Cc: ryan.roman@akerman.com

Subject: Kraft v. Chevron Corp. et al., Case No. 2:21-cv-00575-DJH (the "Arizona Litigation").

Mr. Kraft:

Please find attached my letter requesting that you file the appropriate pleading or pleadings to dismiss my client, W. R. Grace & Co., and any and all affiliates with prejudice from the litigation captioned *Kraft v. Chevron Corp. et al.*, Case No. 2:21-cv-00575-DJH.

I look forward to your confirming no later than July 2, 2021, that you will file the appropriate pleading or pleadings no later than July 7, 2021.

Please do not hesitate to contact me if you have any questions.

Warmest Regards. R

Roger J. Higgins

THE LAW OFFICES OF ROGER HIGGINS, LLC

516 N. Ogden Ave

Suite 136

Chicago, IL 60642

United States

Tel: (312) 480-1984

e-mail: rhiggins@rogerhigginslaw.com

www.rogerhigginslaw.com

This message contains PRIVILEGED AND CONFIDENTIAL INFORMATION intended solely for the use of the addressee(s) named above. Any disclosure, distribution, copying or use of the information by others is strictly prohibited. If you have received this message in error, please notify the sender by immediate reply and delete the original message. Thank you.